

**ZAVALA LAW GROUP, P.C.**

Joe Innumerable, Esq. (Bar No. 144076)  
Salomon Zavala, Esq. (Bar No. 243424)  
Email: [szavala@zavalalawgroup.com](mailto:szavala@zavalalawgroup.com)  
811 W. 7th Street, Suite 1200  
Los Angeles, CA 90017  
Telephone: (213) 413-0144

Attorney for Defendant, HONOR THE EARTH

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

RONEN HELMANN, on behalf of all  
others similarly situated, and,

Plaintiffs,

vs.

CODEPINK WOMEN FOR PEACE, a  
California entity, CODEPINK ACTION  
FUND, a California entity, HONOR THE  
EARTH, a Minnesota entity, COURTNEY  
LENNA SCHIRF, and REMO IBRAHIM,  
d/b/a PALESTINIAN YOUTH  
MOVEMENT, and JOHN AND JANE  
DOES 1-20,

Defendants.

CASE NO. 2:24-CV-05704-SVW-  
PVC

*Assigned for all purposes to:  
Honorable Stephen V. Wilson*

**DEFENDANT HONOR THE  
EARTH'S NOTICE OF MOTION  
AND MOTION TO STRIKE AND  
DISMISS PLAINTIFFS' SECOND  
AMENDED CLASS ACTION  
COMPLAINT**

Hearing Date: February 10, 2025  
Time: 1:30 p.m.  
Dept.: Courtroom 10A

**SAC Filed: December 19, 2024  
Trial Date: Not Set**

**TO ALL PARTIES AND THEIR ATTORNEY OF RECORD:**

This motion is made following the conference of counsel pursuant to L.R. 7-3 which, took place on January 3, 2025. PLEASE TAKE NOTICE that on February 10, 2025, these matters will be heard, at the First Street Courthouse,

1 located at 350 W. 1st Street, Courtroom 10A, 10th Floor, Los Angeles, California  
2 90012 at 1:30 p.m. Attorney for Defendant Honor the Earth (hereinafter “HTE”)  
3 will move the Court to strike and to dismiss the Second Amended Complaint  
4 (“SAC”) of Plaintiff, Ronen Helmann, on behalf of all others similarly situated,  
5 and (hereinafter “Plaintiffs”) naming HTE as a Defendant.

6 The Motion to Strike is based upon Federal Rules of Civil Procedure, Rule  
7 12(f), as the language which HTE seeks to strike is both scandalous and speculative,  
8 and is thus proper and appropriate to be stricken from the SAC. The Motion to  
9 Dismiss is based on Federal Rule of Civil Procedure 12(b)(6) and 12(b)(2), on the  
10 basis that the SAC fails to state a claim against HTE and the Court lacks personal  
11 jurisdiction over HTE.

12 This Notice of Motion is based on the Motion to Strike and Dismiss Plaintiffs’  
13 Second Amended Complaint and the Memorandum of Points and Authorities, along  
14 with all papers and filings in this matter, all matters of which this Court takes judicial  
15 notice, all Reply Memorandum of Points and Authorities, and upon such oral  
16 argument as may be presented at the hearing.

17 Dated: January 9, 2025

Respectfully Submitted,

**ZAVALA LAW GROUP, P.C.**

*/s/ N. Joe Innumerable*

N. JOE INUMERABLE, ESQ.

Attorney for Defendant

HONOR THE EARTH

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is:

**ZAVALA LAW GROUP, P.C.**

811 W. 7th Street, Suite 1200  
Los Angeles, CA 90017

On January 9, 2025, I served the foregoing document described as **DEFENDANT HONOR THE EARTH'S NOTICE OF MOTION AND MOTION TO STRIKE AND DISMISS PLAINTIFFS' SECOND AMENDED CLASS ACTION COMPLAINT** on the interested parties in this action via CM/ECF system following the Central District of California Local Rules for service upon the parties listed below:

Mark L. Javitch  
Javitch Law Office  
East 3rd Ave. Ste. 200  
San Mateo, CA 94401  
Email: [mark@javitchlawoffice.com](mailto:mark@javitchlawoffice.com)  
Attorney for Plaintiffs

Dated: January 9, 2025

*Lauren Stiles*

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